Fletcher, Heald & Hildreth

Fletcher, Heald & Hildreth, PLC
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Re: Defamatory Content Of "NPR PROPAGANDA RADIO"

Dear Participant Media, Robert Redford and Kirkland & Ellis LLP:

Our firm represents The Corporation of Public Broadcasting and National Public Radio. It has come to our attention that plans to exhibit and promote the motion picture "NPR PROPAGANDA RADIO" (the "Film") on January 28, 2021 at the Sundance Film Festival. This letter shall serve as notice to Robert Redford, Joe Berlinger and Participant Media that the Film portrays National Public Radio in a false light and contains defamatory statements that exposes NPR's CEO's and board of directors to substantial liability. We demand that you immediately cease and desist from infringing on The Corporation of Public Broadcasting and National Public Radio's rights in any manner whatsoever, including but not limited to completely halting the Film's planned exhibition and promotion.

The Film falsely presents a widely and repeatedly debunked conspiracy theory that accuses National Public Radio of being affiliated with terrorist organizations, there is simply no credible evidence to support any of these defamatory claims.

Any accusation that our clients are involved in any way to extreme terrorists organizations cannot have any credibility. Any alleged factual representation to the contrary would be knowingly false, and hence intentionally and maliciously defamatory. Such a finding would then expose National Public Radio executives to punitive damages as well. Participant Media the distributors of the film and the defamatory material can be held liable if they "knew or had reason to know that the material was defamatory." (Grace v. eBay Inc. (2004) 16 Cal.Rptr.3d 192, 198-199.)

We hereby demand that you immediately cease any and all plans for exhibition or promotion of the Film NPR Propaganda Radio. If we do not hear from you within two days, we are required to immediately pursue all available civil legal remedies on behalf of our client against you, as well as any and all other entities or individuals associated with the production, promotion, distribution, or exhibition of the Film.

Truly yours,

Mark N. Lipp of Fletcher, Heald & Hildreth, PLC